

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1-25-MJ-99

MANUEL DE JESUS FLORES-FLORES,

Defendant

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, **Arrikka Drew**, being duly sworn, depose and state:

1. I am a Special Agent employed by the Immigration and Customs Enforcement (hereinafter ICE), United States Department of Homeland Security. Previously I worked for the United States Department of Commerce, Office of Inspector General (OIG) as a Special Agent for approximately two years. I am assigned to the Washington District Office, Office of Investigations located in Sterling, Virginia. My duties as a Special Agent include investigating violations of both immigration and customs laws. I have successfully completed the Criminal Investigator Training Program, the Immigration and Customs Special Agent Training and the Office of Inspector General Training Program at the Federal Law Enforcement Training Center in Glynn County, Georgia.

2. My duties as a Special Agent with ICE include investigating administrative and criminal violations of the Immigration and Nationality Act and Title 8 of the United States Code, and seeking, when applicable, prosecution and removal of violators. I have received training in general law enforcement, including training in Title 8 of the United States Code.

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for Manuel De Jesus FLORES-FLORES (hereafter referred to as FLORES-FLORES), an alien who was found in the United States after being denied admission, excluded, deported, or removed, or having departed the United States while an order of exclusion, deportation, or removal was outstanding, in violation of Title 8, United States Code, Section 1326(a).

4. The facts and information contained in this affidavit are based upon my training and experience, as well as information and observations of other agents involved in this investigation that were relayed to your affiant. This affidavit contains information necessary to support probable cause, but it is not intended to include every fact and matter observed by me or known to the United States.

SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE

5. On or about October 12, 2024, ICE learned that FLORES-FLORES had been detained at the Fairfax County Adult Detention Center located in Fairfax, Virginia, within the Eastern District of Virginia.

6. FLORES-FLORES was fingerprinted when arrested in Fairfax and those fingerprints came back to a unique FBI number associated with FLORES-FLORES. Those fingerprints were then processed through ICE indices containing fingerprint records of known and previously deported aliens. This system is also integrated with the criminal records maintained by the FBI and is

commonly referred to as Next Generation Identification (NGI). Results of this query showed positive matches to FLORES-FLORES and his unique FBI number. Specifically, the immigration record checks confirmed that FLORES-FLORES is a native and citizen of El Salvador with an associated alien file.

7. ICE immigration record checks also confirmed that FLORES-FLORES was removed from the United States on or about August 22, 2012, at or near Houston, Texas. At the time of removal, FLORES-FLORES did not have legal authorization to reenter or remain in the United States.

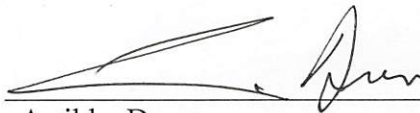
8. I also reviewed documents from FLORES-FLORES's aforementioned alien file maintained by U.S. Citizenship and Immigration Services (USCIS). The alien file was associated with FLORES-FLORES through, among other things, his unique FBI number. I reviewed in the file, also known as an alien file, revealed that FLORES-FLORES is a citizen and national of El Salvador. The documents I reviewed contained an executed Immigration Service Form I-296 "Notice to Alien Ordered Removed/Departure Verification," bearing FLORES-FLORES's photograph, fingerprint, and signature. The form showed that FLORES-FLORES was removed from the United States on or about August 22, 2012, at or near Houston, Texas.

9. Records checks were conducted of both ICE and USCIS indices which revealed a lack of evidence of any immigration benefit, document, or status that would allow FLORES-FLORES to legally enter, be admitted, pass through, or reside in the United States. Furthermore, FLORES-FLORES has not obtained permission from the Attorney General or the Secretary of the Department of Homeland Security to reenter the United States following his formal removal.

CONCLUSION

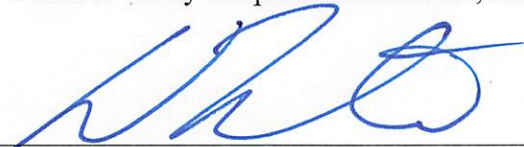
10. Based on the foregoing, I submit that there is probable cause to believe that on or about October 12, 2024, in Fairfax County, Virginia, within the Eastern District of Virginia, FLORES-FLORES, an alien who was removed from the United States on or about August 22, 2012, at or near Houston, Texas, was found in the United States without having obtained the express consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Arrikka Drew', is written over a horizontal line.

Arrikka Drew
Special Agent
Immigration and Customs Enforcement

Respectfully submitted and attested to in
accordance with the requirements of Fed. R.
Crim. P. 4.1 by telephone on Feb. 28, 2025.

A handwritten signature in blue ink, appearing to read 'William E. Fitzpatrick', is written over a horizontal line.

The Honorable William E. Fitzpatrick
United States Magistrate Judge
Alexandria, Virginia